

IN THE MATTER OF:) CHAPTER 11
)
ADVANCED PLUMBING CORP.) JUDGE CAROL A. DOYLE
)
DEBTOR.) CASE NO. 09-43309

NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE that on April 12, 2011, at the hour of 10:00 a.m. or as soon thereafter as counsel may be heard, a hearing on the attached MOTION FOR ENTRY OF FINAL DECREE will be heard before the Honorable Carol A. Doyle, Bankruptcy Judge at 219 S. Dearborn, Room 742, Chicago, Illinois, or before any other bankruptcy Judge sitting in her stead.

AT WHICH TIME AND PLACE YOU MAY APPEAR IF YOU SEE FIT.

Penelope N. Bach
P.O. Box 1285
Northbrook, IL 60065
(847) 564-0808

CERTIFICATE OF SERVICE

I, Penelope N. Bach, an attorney, on oath, certify that I served a copy of the above Notice, together with the attached Motion and all Attachments, by First Class US Mail postage prepaid on all parties on the attached service list on April 5.


/s/ Penelope N. Bach

Service List

Advanced Plumbing Corp.

521 N. Wolfe Road
Wheeling, Illinois 60090

United States Trustee

219 S. Dearborn Street
Chicago, Illinois 60604

Sheryl A. Fyock

Latimer LeVay Jurasek LLC

55 West Monroe Street
Suite 1100
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Attorney General

State of Illinois (14726799)
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475 CrossPoint Parkway (14726800)
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Getzville, NY 14068-9000

Bank of America

Attn: Bankruptcy NC4-105-02-99 (14726802)
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Citibank USA

Attn: Centralized Bankruptcy (14726803)
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Kansas City, MO 64195

CitiBusiness / AAdvantage Card

PO Box 6235 (14726804)
Sioux Falls, SD 57117-6235 (cr)

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Illinois Department of Employ Sec (14726808)
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BPC 8th FL (cr)
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Illinois Department of Labor (14726810)
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Illinois Department of Revenue
Bankruptcy Section (14726811)
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Chicago, IL 60606

Internal Revenue Service (14726812)
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:)	CHAPTER 11
)	
ADVANCED PLUMBING CORP.)	JUDGE CAROL A. DOYLE
)	
DEBTOR.)	CASE NO. 09-43309

MOTION FOR ENTRY OF FINAL DECREE

NOW COME the Debtor and Debtor in Possession, **CLASS A PROPERTIES SEVEN, LLC**, by their attorneys PENELOPE N. BACH of BACH LAW OFFICES, and ask this Honorable Court to enter a Final Decree. In support thereof, the Debtor and Debtor in Possession states as follows:

1. On November 16, 2009, the Debtors filed a Voluntary Petition For Relief, according to the provisions of Chapter 11 of the United States Bankruptcy Code.
2. On October 4, 2010, this Court held a hearing and confirmed entered an Order pursuant to Section 1129 of the bankruptcy Code confirming the Debtors' Plan of Reorganization.
3. Pursuant to the Confirmed Plan, Debtors' Payments to Advanced Plumbing's creditors (administrative) are to be paid upon approval of the claims by the court.
4. Pursuant to the Confirmed Plan, Debtors' payments to the Advanced Plumbing's creditor has continued and begun.
5. Pursuant to the Confirmed Plan, Debtors' payments to Class 3 creditors (impaired unsecured non priority creditors) has begun, and, as this date has not been completed.
6. The plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.

The final decree should expressly reserve jurisdiction in this Court for all pending matters, all final fee hearings, and those matters enumerated in Article VI of the Plan.

WHEREFORE, the debtors and debtors in possession, Advanced Plumbing, asks this Honorable Court to enter a Final Decree closing this Chapter 11 case with an express reservation of jurisdiction and for such other relief as is just and equitable.

Respectfully submitted,
Advanced Plumbing

BY: /s/ Penelope N. Bach
One of their attorneys

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